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6
7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE DISTRICT OF ARIZONA

9 IN RE BARD IVC FILTERS PRODUCTS
LIABILITY LITIGATION

No. 2:15-MD-02641-PHX-DGC

10 This Document Applies to:

11 **WILLIAM CONRAD**
12

**SECOND AMENDED MASTER
SHORT FORM COMPLAINT FOR
DAMAGES FOR INDIVIDUAL
CLAIMS AND DEMAND FOR JURY
TRIAL**

13
14 Plaintiff(s) named below, for their Complaint against Defendants named below,
15 incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc. 364).
16 Plaintiff(s) further show the Court as follows:

17 1. Plaintiff/Deceased Party:

18 William Conrad

19 2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of
20 consortium claim:

21 None

22 3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):

23 None

24 4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the
25 time of implant:

26 **WA** OR
27
28

1 5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the
2 time of injury:

3 **WA** OR

4 6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

5 **WA** OR

6 7. District Court and Division in which venue would be proper absent direct filing:
7 United States District Court for

8 8. Defendants (Check Defendants against whom Complaint is made):

9 ☒ C.R. Bard Inc.

10 ☒ Bard Peripheral Vascular, Inc.

11 9. Basis of Jurisdiction:

12 ☒ Diversity of Citizenship

13 ☐ Other: _____

14 a. Other allegations of jurisdiction and venue not expressed in Master
15 Complaint:

16 _____
17 _____
18 _____

19 10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a
20 claim (Check applicable Inferior Vena Cava Filter(s)):

21 ☐ Recovery[®] Vena Cava Filter

22 ☒ G2[®] Vena Cava Filter

23 ☐ G2[®] Express

24 ☐ G2[®] X Vena Cava Filter

25 ☐ Eclipse[®] Vena Cava Filter

26 ☐ Meridian[®] Vena Cava Filter

27 ☐ Denali[®] Vena Cava Filter

state the facts supporting this Count in the space
immediately below)

13. Jury Trial demanded for all issues so triable?

☒ Yes

☐ No

RESPECTFULLY SUBMITTED this 20th day of February, 2019.

By: /s/ John A. Dalimonte

John A. Dalimonte

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I hereby certify that on this **20th** day of **February**, 2019 I electronically transmitted
the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal
of a Notice of Electronic Filing.

/s/ John A. Dalimonte